

Federal Regulatory



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January 28, 2002

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

*RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region,
InterLATA Services in State of New Jersey, Docket No. 01-347*

Dear Ms. Salas:

On Friday, January 25, 2002 A. Berkowitz C. Odom, L. Owsley, K. Zacharia, D. May and S. Angstrich representing Verizon had call with R. MacDonald, G. Cohen, J. Miller J. Reel, R. Tanner, B. Olson and A. Johns from CCB.

During that call, Verizon explained that it has recently become aware of two issues that led to the total number of observations for certain provisioning and maintenance and repair measurements for the five reporting regions in New Jersey being slightly lower than the reported statewide number of observations for those measurements. These issues did not affect the accuracy of the reported statewide number of observations for these measurements or the statewide performance results.

First, Verizon discovered that, for certain maintenance and repair measurements, 1,719 test lines are included in the statewide total number of observations for the retail comparison group. However, these lines are not assigned to any of the five regions in New Jersey and, therefore, do not appear in the region-specific performance reports. The result is that, for the retail comparison group, the sum of the number of observations for the five regions is 1,719 observations lower than the reported statewide number of observations. Verizon is in the process of assigning each of these test lines to the appropriate region in New Jersey.

Second, Verizon discovered that the systems used to create its performance reports did not have the most up-to-date NPA/NXX tables. The systems use the NPA/NXX codes to determine the appropriate reporting region for an order. If an order has an NPA/NXX code that is not in the tables contained in the performance reporting systems, that order will appear in the statewide total, but will not appear in the region-wide totals. As a result, for certain provisioning measurements, a few orders that are counted in the statewide number of observations are not counted in any of the five regions. For example, for Average Interval Offered – Total No Dispatch – Platform (PR-1-01-3140), the following number of observations were reported in October 2001:

	Verizon Observations	CLEC Observations
Southern	1938	83
Eastern Shore	3912	138
Raritan	3062	140
Suburban	3636	187
Hudson-Bergen	4276	174
5-Region Total	16824	722
Reported Statewide Total	16878	724
Difference (Percentage)	54 (0.3%)	2 (0.3%)

Thus, approximately 0.3 percent of the actual number of statewide observations for this measurement were not assigned to one of the five regions, suggesting that the NPA/NXX tables were 99.7% accurate. In order to eliminate this minor discrepancy, Verizon updated the NPA/NXX tables in its performance reporting systems on January 18, 2002, and implemented procedures in all of the former Bell Atlantic jurisdictions to ensure that these tables remain up-to-date.

Verizon also explained that it submitted its New Jersey line sharing performance results for August through October 2001 under the measurements approved by the New Jersey BPU in November 2001, which are based on those adopted by the Carrier Working Group in New York. See Guerard/Canny/DeVito Decl. ¶ 11 & Att. 2. On January 2, 2002, Verizon submitted its performance results under these measurements for May through October 2001. See Ex parte from Clint E. Odom, Verizon, to Magalie Roman Salas, FCC, CC Docket No. 01-347 (FCC filed Jan. 2, 2002). Thus, as the BPU has found, “[p]ending inclusion of the line sharing metrics [in the New Jersey Guidelines], Verizon NJ has provided reports showing its xDSL line sharing performance.” Consultative Report of the New Jersey Board of Public Utilities at 81, CC Docket No. 01-347 (FCC filed Jan. 14, 2002).

Verizon’s proposal to incorporate the recently adopted New York line splitting measurements into the New Jersey Guidelines “is still pending.” Id.; see Guerard/Canny/DeVito Decl. ¶ 23. However, “Verizon is not aware of any CLECs that are engaging in line splitting in New Jersey using existing network elements” and, “as of October 30, 2001, no CLEC in New Jersey has submitted any line splitting orders using Verizon’s new line splitting OSS capability.” Lacouture/Ruesterholz Decl. ¶ 151.

Finally, during the call Verizon discussed its plans to create a separate division in New Jersey that will provide advanced services, and the reasons that Verizon declared a potential force majeure after September 11, 2001.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2994.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clint E. Odom".

Clint E. Odom

cc: A. Johns
S. Pie
J. Miller
G. Cohen
B. Olson
R. Tanner
J. Miller
R. MacDonald
J. Reel